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Case 1:04-cv-01784-ILG-CLP
04/07/2005 14:01 516-571-3058

DANIEL J. HANSEN, ESQ.
Document 19-2 Filed 04/12/2005
NASSAU CTY ATTY OFF

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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THOMAS HARTMANN,

Plaintiff,

-against-

CV-04-1784 (ILG) (CLP)

THE COUNTY OF NASSAU, NASSAU COUNTY POLICE
DEPARTMENT, POLICE OFFICER KARL N. SNELDERS,
POLICE OFFICER MICHAEL KNATZ, DEPUTY
INSPECTOR ROBERT TURK, LIEUTENANT THOMAS
ZAMOJCIN, POLICE OFFICER KEVIN W. SMITH, POLICE
OFFICER PHIL P BRADY, DETECTIVE BARRY O.
FRANKLIN, POLICE OFFICER THOMAS O. McCaffrey
and "JOHN and JANE DOES 1-15" representing as yet
unknown and unidentified police officers.

Defendants.
-----X

STIPULATION OF CONFIDENTIALITY

It is hereby stipulated and agreed, by and between Plaintiff, by his undersigned counsel
and Defendants, by their undersigned counsel that:

1. The Defendants agreed or were otherwise directed by the Court to provide the Plaintiff in
this action with certain records and/or documents of the Nassau County Police Department and
records pertaining specifically to Defendants Police Officer Karl N. Snelders and Police Officer
Michael Knatz that are not already in the public domain.
2. The Plaintiff hereby agrees that he will not disseminate or disclose, or cause to be
disseminated or disclosed, to any individual, any of the information produced or contained in the
documents disclosed.
3. The Plaintiff further agrees that he will use the documents and/or information provided
solely for the purposes of this action and will not disseminate or disclose, or cause to be
disseminated or disclosed, any documents and/or information contained within.

04/07/2005 15:15 2125973711
Case 1:04-cv-01784-ILG-CLP
04/07/2005 14:01 516-571-3038

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4. The Plaintiff further agrees that he will not make additional copies of these documents and/or records unless necessary for the purposes of this action and, in any event, will not retain any copies of these documents and/or records after trial in this action.

5. The Plaintiff further agrees to return all copies of all documents and/or records provided to Plaintiff to the attorney for the Defendants when this action has been terminated.

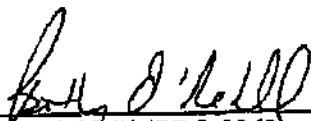
For purposes of this Stipulation, a facsimile shall be deemed an original copy.

Dated: April 7, 2005

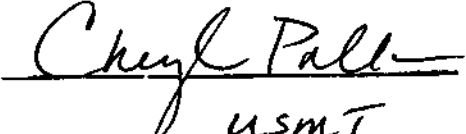
Daniel J. Hansen
Attorney at Law

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LORNA B. GOODMAN
Nassau County Attorney

By: 
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Attorney for Defendants

SO ORDERED:


usmj
4/15/05